UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark A. Leskowicz
Momentive Performance Materials Inc.
3500 South State Route 2
Friendly, WV 26146

Re: MPM Silicones Facility
EPA ID Number: WVD004325353

Dear Mr. Leskowicz:

This letter is in reference to the MPM Silicones Facility ("Facility") located at 3500 South State Route 2, Sistersville, West Virginia, and certain activities conducted at this Facility which resulted in releases of hazardous waste, hazardous substances, pollutants or contaminants into the environment. It has come to EPA's attention that a release of polychlorinated biphenyls ("PCBs") has occurred at the Facility and that company officials became aware of the release some time in 2003 but did not report the release to EPA as required by the Permit for Corrective Action (WVD 004 32 5353) in effect at the time.

Pursuant to the authority granted to the EPA under Section 3007(a) of the RCRA, 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of EPA, duly designated by the Administrator, ...furnish information relating to such wastes...". EPA is also requesting information pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e), which grants EPA the authority to require Momentive Performance Materials Inc. ("MPM" or "you") to furnish all information and documents in your possession, custody or control, or in the possession, custody or control of any of your employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), pollutants and/or contaminants as defined by Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), as well as your ability to pay for or perform a cleanup at the above-referenced Facility. EPA hereby requests that you furnish to EPA a written response to the information requested below relating to the Facility, including all documents responsive to such request.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, and Section 104 of CERCLA, 42 U.S.C. § 9604, authorize EPA to pursue penalties for failure to comply with or respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under

18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Instructions for responding to this required submission of information are provided below.

INSTRUCTIONS

1. You are entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure 1, *Business Confidentiality Claims/Disclosure To EPA Contractors & Grantees Of Your Response*. You must clearly mark such information by either stamping or using any other form of notice that such information is trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

2. Please provide a separate, detailed narrative response to each question, and to each subpart of a question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.

3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate by the number of the specific question(s) or subpart of the question(s) to which it responds.

4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth, or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.

5. Any terms that are used in this Information Request and/or its enclosures, that are defined in CERCLA shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure 2, Definitions, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure 2. Those terms shall have the meaning set forth in Enclosure 2 any time such terms are used in this Information Request and/or its Enclosures. All other terms used in this request for information that are defined in the RCRA, 42 U.S.C. §§ 6901 et seq. or 40 C.F.R. Parts 260-266, 268, and 273 shall have the meanings set forth therein.

6. Your response must include the following signed and dated certification:

> I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the

system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
Name: _____
Title: _____

Requested Information

1. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with determining the extent of PCB contamination in and around the SB-71 area (i.e., surface soil, subsurface soil, sediment, and groundwater sampling). Your response should include all work plans, analytical results and lab data sheets, quality assurance data, comments and response to comments, recommendations, and summary information for the Phase I, Phase II, and Phase III SB-71 Alternative Sampling plans.

2. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with determining the extent of PCB contamination in and around the Wastewater Upgrade Area (i.e., surface soil, subsurface soil, sediment, and groundwater sampling). Your response should include all work plans, analytical results and lab data sheets, quality assurance data, comments and response to comments, recommendations, and summary information.

3. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with determining the extent of PCB contamination in and around the Burn Bank Area (i.e., surface soil, subsurface soil, sediment, and groundwater sampling). Your response should include all work plans, analytical results and lab data sheets, quality assurance data, comments and response to comments, recommendations, and summary information. In addition, please provide a detailed plant map identifying the exact location of the "Burn Bank Area".

4. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with the North Inactive Site Area. Your response should include data associated with any leachate collection system, surface water runoff/storm water collection systems, soil borings, groundwater monitoring and sampling, or sediments from any stream which may come in contact with materials deposited in this landfill disposal site.

5. For the time period beginning July 31, 2003, to the present, provide information associated with any PCB quantification in the plant's wastewater treatment system and also in the plant outfall to the Ohio River.

6. For the time period beginning July 31, 2003, to the present, provide copies of all

correspondence with Kelly Bunker, EPA Region III PCB Coordinator, or any other staff in the Region's PCB Program , concerning Phase III PCB characterization at SB-71.

7. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with the areas referenced in Requests 1, 2, 3, and 4, above, that would be indicative of the presence of any other compound/chemical species that may be considered a "hazardous underlying constituent" which may have been deposited either separately or in conjunction with the PCB containing residues into the 'Lime Pits" and then ultimately into the North Inactive Site.

8. Provide a copy of the Purchase and Exchange Agreement between Crompton Corporation and GE Silicones WV, L.L.C., dated on or about April 24, 2003.

9. Provide copies of any historical documents regarding the Facility from the 1980's to the present which discuss the presence of PCBs at the Facility and any evaluation regarding regulatory reporting requirements performed by Union Carbide.

10. Provide information concerning any and all environmental monitoring, testing, or sampling activities associated with the process areas where PCBs were utilized as heat transfer fluids and thus may have been present in distillation bottoms .

11. Provide information detailing the handling and disposal of heat transfer fluids and distillation bottoms which may have contained PCBs at the Facility.

12. Identify any agreements or contracts with entities that may have some responsibility for and/or who are participating in the investigation and remediation of releases of hazardous waste and/or hazardous constituents from the Facility. Include with your response copies of any such agreements and all correspondence related to such agreements.

13. Identify all persons (full name, address and title) who were in any manner involved in answering and/or providing information concerning the answers provided in your response to this information request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

You must respond in writing to this required submission of information within thirty (30) calendar days of your receipt of this letter. You may also request to meet with EPA to discuss the releases noted above. If you wish to meet with EPA, you must contact Mr. Bill Wentworth, at (215) 814-3184, within ten (10) calendar days of your receipt of this letter to arrange a time to meet. A request for such a meeting will not change the due date for your response.

If, for any reason, you do not provide all information responsive to this letter, then in your answer to EPA you must: (1) describe specifically what was not provided, and (2) provide to EPA an appropriate reason why the information was not provided.

Please send, or otherwise ensure delivery of, one copy of the requested information within thirty (30) calendar days of your receipt of this letter to:

Mr. Bill Wentworth (3LC20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act of 1980, 44 U.S.C. Sections 3501-3520.

If you have any questions concerning this matter, please contact Mr. Bill Wentworth at (215) 814-3184 or have your attorney contact Ms. Cynthia Nadolski in the Office of Regional Counsel at (215) 814-2673.

Sincerely,

Luis Pizarro, Associate Director
Office of Remediation
Land and Chemicals Division
U.S. EPA Region III

Enclosures: Enclosure 1: Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees
Enclosure 2: Definitions

cc: D. Martin (WVDEP)
M. Wade (WVDEP)
C. Nadolski (3RC43)
B. Wentworth (3LC20)
R. Hiley, Esq.

Enclosure 1

Business Confidentiality Claims

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. You must clearly mark such claimed information by either stamping or using any other such form of notice that such information is a trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

Disclosure Of Your Response to EPA Contractors and Grantees

EPA may contract with one or more independent contracting firms to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employment Program (SEE Enrollees). The SEE program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for EPA personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to CERCLA, 42 U.S.C. Section 9604(e)(7) and EPA's regulations at 40 C.F.R. Section 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed.Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI, you must notify EPA in writing at the time you submit such documents.

Enclosure 2

Definitions

1. The term "arrangement" shall mean every separate contract or other agreement or understanding between two or more persons, whether written or oral.

2. The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, interoffice and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.

3. The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 of the U.S. Code, (b) any element, compound, mixture, solution, or substance designated pursuant to section 102 of CERCLA 42 U.S.C. section 9602, any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (42 U.S.C. Section 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act (42 U.S.C. Section 6901 et seq.) has been suspended by Act of Congress), (d) any toxic pollutant listed under section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act (42 U.S.C. Section 7412), and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to section 2606 of Title 15 of the U.S. Code. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

4. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions

in reproduction) or physical deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).

5. The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954 (42 U.S.C. Section 2011 et seq.), if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 170 of such Act (42 U.S.C. Section 2210), or, for the purposes of section 9604 of CERCLA or any other response action, any release of source byproduct, or special nuclear material from any processing site designated under sections 7912(a)(1) or 7942(a) of the Uranium Mill Tailings Radiation Control Act of 1978, 42 U.S.C. 7912 (a)(1) or 7942 (9), and (d) the normal application of fertilizer.

6. The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.

7. The term "you" when referring to an incorporated entity shall mean and include the incorporated entity and its agents and representatives, including, but not limited to, persons directly authorized to transact business on the entity's behalf such as officers, directors, or partners with which the entity is affiliated, employees, accountants, engineers, or other persons who conduct business on the entity's behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, holding companies.

MOMENTIVE™

MPM Silicones, LLC Sistersville Plant
3500 South State Route 2
Friendly, WV 26146
momentive.com

August 1, 2012

FEDERAL EXPRESS

Bill Wentworth (3LC20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: MPM Silicones Facility
EPA ID No. WVD004325353

Dear Mr. Wentworth:

Momentive Performance Materials Inc. on behalf of MPM Silicones, LLC (collectively "MPM") writes in response to EPA's recent Information Request (the "Request") concerning PCB contamination at MPM's facility in Sistersville, West Virginia (the "Facility"). MPM submits this response to the Request in accordance with Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), as amended, and Section 3007(a) of RCRA, 42 U.S.C. § 6927(a).

Promptly upon receiving the Request, MPM undertook a diligent investigation to locate any information it had that was responsive to the Request. This response was prepared with the assistance of agents and representatives of MPM believed to have relevant information. The answers set forth herein, subject to inadvertent or undiscovered errors or omissions are based on and therefore necessarily limited by the records and information still in existence and thus far discovered in the course of the preparation of this response. Finally, because certain items of the Request seek documents and information about historical operations not conducted by MPM, portions of this response are not made on the basis of personal knowledge and were prepared exclusively by and with the assistance and advice of counsel, which advice was relied upon herein.

MPM notes that it has never utilized or disposed of any PCBs used in manufacturing conducted at the Facility; rather PCB use and disposal at the Facility apparently arose from operations conducted by former Facility operators, including Union Carbide Corporation ("UCC") which owned and operated the Facility from the 1950s until the early 1990s. To the extent that MPM has any information about PCB use and disposal at the Facility, that information comes from historical documents which MPM obtained either in connection with its acquisition of the Facility in 2006 or subsequently through efforts to investigate

the presence of PCB contamination at the Facility. MPM has not attempted to determine if any of its current employees had prior employment at the Facility with UCC or other entities that may have had some role in historical operations at the Facility.

Subject to and without waiver of its objections, MPM makes the following response to the Request:

GENERAL OBJECTIONS

MPM objects to the Request insofar as it exceeds EPA's authority under RCRA and CERCLA.

MPM objects to the Request to the extent it seeks information that is neither relevant nor likely to lead to the discovery of relevant information.

MPM objects to the Request insofar as it seeks information regarding privileged documents and privileged communications, including without limitation materials subject to the attorney-client privilege and the work-product doctrine.

MPM objects to the Request to the extent it is vague, overbroad, and unduly burdensome, and to the extent it requests MPM to produce information or documents that are already in the possession of EPA.

MPM objects to the Request to the extent it seeks to require MPM to produce reports and other documents which it has previously submitted to EPA. Upon specific request, MPM will furnish duplicate copies of such reports or documents.

MPM objects to the Request insofar as it seeks to impose duties or require the performance of acts beyond the scope of applicable laws.

SPECIFIC RESPONSES TO THE NUMBERED ITEMS OF THE REQUEST

1. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with determining the extent of PCB contamination in and around the SB-71 area (i.e., surface soil, subsurface soil, sediment, and groundwater sampling). Your response should include all work plans, analytical results and lab data sheets, quality assurance data, comments and response to comments, recommendations, and summary information for the Phase I, Phase II, and Phase III SB-71 Alternative Sampling plans.

RESPONSE: MPM has not conducted any PCB testing in the SB-71 Area. MPM believes that the first PCB testing in that area during the relevant time period was conducted by Environ Corporation ("Environ") a consultant to General Electric Company ("GE") prior to or shortly after GE's acquisition of the Facility. Based on the results of Environ's testing, GE requested that Chemtura Corporation ("Chemtura", the preceding owner of the Facility, then known as Crompton Corporation) undertake further PCB testing at the Facility (in addition to the documents produced in response to item 1 of the Request, additional correspondence between GE – and later MPM – and Chemtura relating to GE's and MPM's requests that Chemtura investigate PCB contamination at the Facility are included in the documents produced in response to item 12 of the Request). After some negotiation, Chemtura appears to have agreed in a June 9, 2005 letter to GE to conduct a "limited soil investigation" (this letter is included in the response to item 12 of the Request). Chemtura then performed two phases of that investigation in the so-called "SB-71 area" and proposed a third phase which was approved in an October 22, 2007 email from Kelly Bunker of EPA. Chemtura did not perform that third phase of investigation. The documents responsive to this item of the Request, are included on the enclosed CD.

2. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with determining the extent of PCB contamination in and around the Wastewater Upgrade Area (i.e., surface soil, subsurface soil, sediment, and groundwater sampling). Your response should include all work plans, analytical results and lab data sheets, quality assurance data, comments and response to comments, recommendations, and summary information.

RESPONSE: In 2008, MPM unexpectedly encountered PCBs in connection with its efforts to develop new wastewater treatment infrastructure at the Facility. MPM subsequently undertook efforts to characterize the extent of PCB contamination in that area. Documents responsive to this item of the Request are included on the enclosed CD. It also appears that the Environ testing referred to in response to item 1 of the Request included some testing for PCBs in locations nearby this area. MPM does not have copies of all of the lab data sheets and other documents from the sampling conducted by its consultants in the Wastewater Upgrade Area. If EPA believes it needs these documents, MPM will attempt to obtain copies of them from its consultants.

3. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities

associated with determining the extent of PCB contamination in and around the Burn Bank Area (i.e., surface soil, subsurface soil, sediment, and groundwater sampling). Your response should include all work plans, analytical results and lab data sheets, quality assurance data, comments and response to comments, recommendations, and summary information. In addition, please provide a detailed plant map identifying the exact location of the "Burn Bank Area".

RESPONSE: The "Burn Bank Area" is a not a term that is currently used to refer to any area of the Facility. MPM's only knowledge of the use of a similar term comes from UCC documents from the late 1970s and early 1980s which refer to disposal of wastes at a "burning bank". From the context of those documents, it appears that they likely refer to a location in the northern portion of the facility. Copies of UCC documents referring to a "burning bank" are included in Exhibit A, which is attached hereto, and also included on the enclosed CD (on the enclosed CD, these documents are provided in response to item 9 of the Request). Although MPM cannot identify the precise location of the "Burn Bank Area", MPM has provided information concerning all monitoring, testing, and sampling activities since July 31, 2003 associated with determining the extent of PCB contamination at the Facility in response to other items of the Request, including items 1, 2, 4 through 6, and 9.

4. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with the North Inactive Site Area. Your response should include data associated with any leachate collection system, surface water runoff/storm water collection systems, soil borings, groundwater monitoring and sampling, or sediments from any stream which may come in contact with materials deposited in this landfill disposal site.

RESPONSE: MPM is not aware of sampling conducted in the North Inactive Site Area since July 31, 2003, other than that contained in the Environ Report, which is included on the enclosed CD as part of MPM's response to item 1 of the Request, or in the annual RCRA Corrective Action reports which have been previously submitted to EPA (which are included on the enclosed CD as part of the response to this item of the Request). MPM has not included all of the lab data sheets associated with the annual RCRA Corrective Action reports on the enclosed CD given how voluminous they are. However, if EPA believes it needs those documents, MPM will provide them to EPA for copying.

5. For the time period beginning July 31, 2003, to the present, provide information associated with any PCB quantification in the plant's wastewater treatment system and also in the plant outfall to the Ohio River.

RESPONSE: Information associated with such quantification, to the extent it exists, is provided on the enclosed CD.

6. For the time period beginning July 31, 2003, to the present, provide copies of all correspondence with Kelly Bunker, EPA Region III PCB Coordinator, or any other staff in the Region's PCB Program, concerning Phase III PCB characterization at SB-71.

RESPONSE: MPM had no communications with Kelly Bunker concerning the Phase III PCB characterization of SB-71. As indicated in MPM's response to item 1 of this Request, MPM is aware that Chemtura or Chemtura's consultant communicated with Kelly Bunker about a Phase III PCB characterization. To the extent that MPM has obtained copies of those communications, they are included on the enclosed CD.

7. For the time period beginning July 31, 2003, to the present, provide information concerning any and all monitoring, testing, or sampling activities associated with the areas referenced in Requests 1, 2, 3, and 4, above, that would be indicative of the presence of any other compound/chemical species that may be considered a "hazardous underlying constituent" which may have been deposited either separately or in conjunction with the PCB containing residues into the "Lime Pits" and then ultimately into the North Inactive Site.

RESPONSE: Information responsive to this item of the Request has been provided in response to items 1 through 4 of the Request. To the extent that this item of the Request seeks information regarding what hazardous underlying constituents may have been deposited in the specified areas, MPM is not in a position to provide a definitive response. MPM has no firsthand knowledge of the disposal of hazardous substances into the Lime Pits or the North Inactive Site because both were closed many years prior to MPM's acquisition of the Facility. Likewise, MPM has no first-hand knowledge of the manufacturing formulations or processes that involved the use of PCBs at the Facility because use of PCBs ceased decades before MPM's acquisition of the Facility. Historical records produced in response to other items of this Request, particularly items 9 and 11, may suggest other hazardous underlying constituents that may have been deposited in the lime pits or the North Inactive Site.

8. Provide a copy of the Purchase and Exchange Agreement between Crompton Corporation and GE Silicones WV, L.L.C., dated on or about April 24, 2003.

RESPONSE: A copy of the Purchase and Exchange Agreement is included on the enclosed CD.

9. Provide copies of any historical documents regarding the Facility from the 1980's to the present which discuss the presence of PCBs at the Facility and any evaluation regarding regulatory reporting requirements performed by Union Carbide.

RESPONSE: MPM does not understand this item of the Request to seek privileged communications about MPM's evaluation of the presence of PCBs in connection with its claims and potential claims against former owners and operators of the Facility. Subject to that understanding, a copy of historical documents regarding the Facility from December of 1978 which discuss the presence of PCBs at the Facility or the related evaluation regarding regulatory reporting requirements performed by UCC are included on the enclosed CD. Please note that in addition to the documents on the enclosed CD identified as responding to this item of the Request, documents produced in response to other items of the Request, including items 1 through 6, and 12, are also responsive to this item. MPM has included documents predating 1980 in its response because it appears from the documents that investigations relating to the presence of PCBs at the Facility began in December of 1978 and continued into the 1980s. Because of the large number of documents on the attached CD, MPM, for EPA's convenience, attaches hereto as Exhibit A hard copies of some of the historical documents relating to UCC's use of PCBs at the Facility.

10. Provide information concerning any and all environmental monitoring, testing, or sampling activities associated with the process areas where PCBs were utilized as heat transfer fluids and thus may have been present in distillation bottoms.

RESPONSE: MPM does not have first-hand knowledge of the use of PCBs at the Facility or the specific areas within the Facility where PCBs where used. EPA's use of the terms "heat transfer fluids" and "distillation bottoms" in this item of the Request is somewhat confusing. As the historical documents reflect, only small quantities of PCBs were used as heat transfer fluids, whereas the bulk of PCBs used at the facility were used as "pot chasers" in the manufacture of several products which

resulted in the generation of "heavies" or distillation bottoms. Specifically, it appears from contemporaneous inventory records prior to the early 1970s that UCC purchased hundreds of thousands of pounds of PCBs, which according to contemporaneous manufacturing records were used as "pot chasers" in the manufacture of several products, including a product referred to as A-1100 and Cyanoethyltriethoxysilane ("CNE"), which resulted in the generation of "heavies" or distillation bottoms. As reflected in contemporaneous documents such as the production cost documents for the A-1100 and CNE, those heavies contained virtually all of the PCBs used as pot chasers. According to historical documents, most of the heavies were disposed of in a Neutralization Tank or in the lime pits at the Facility. Documents relating to UCC's use and disposal of PCBs are included on the enclosed CD in response to items 9 and 11 of the Request. To the extent that this item of the Request seeks information regarding monitoring, testing, or sampling activities at locations where UCC used PCBs in its manufacturing processes, MPM does not have specific information about where at the facility those manufacturing processes occurred. MPM has included information relating to the monitoring, testing, and sampling for PCBs that have occurred at various locations at the Facility in response to other items of the Request, including items 1 through 7, 9, and 12.

11. Provide information detailing the handling and disposal of heat transfer fluids and distillation bottoms which may have contained PCBs at the Facility.

RESPONSE: All of the information MPM has obtained relating to the handling and disposal of PCBs used in manufacturing processes at the Facility is derived from historical documents originally maintained by UCC. MPM has no firsthand information relating to that handling or disposal of PCBs used in manufacturing. However, the documentation available is substantial. A literal reading of this item of the Request might require the production of numerous boxes of documents comprised of historical inventory and manufacturing production records of UCC which relate to UCC's purchase and use of PCBs. MPM provides a sample of those documents in response to this item of the Request. If EPA wants to obtain a copy of these documents, MPM will produce them to EPA which can then arrange for copies to be made. Documents responsive to this item of the Request are also included in MPM's response to item 9 of the Request.

12. Identify any agreements or contracts with entities that may have some responsibility for and/or who are participating in the investigation and remediation of releases of hazardous waste and/or hazardous constituents from the Facility.

Include with your response copies of any such agreements and all correspondence related to such agreements.

RESPONSE: MPM understands the use of the term "entities" in this item of the request to exclude consultants or environmental professionals. MPM does not understand this item to seek confidential settlement communications. Subject to the foregoing, MPM refers to the Purchase and Exchange Agreement produced on the enclosed CD in response to item 8 of the Request and correspondence between GE or MPM and Chemtura relating to claims pursuant to that Agreement, which are included on the enclosed CD in response to this item of the Request.

13. Identify all persons (full name, address and title) who were in any manner involved in answering and/or providing information concerning the answers provided in your response to this information request.

RESPONSE: Mark Leskowicz, Steven Klarman, and Raymond Hiley from MPM and Robert Sanoff, Adam Kahn, and Zachery Gerson from Foley Hoag LLP all assisted in responding to the Request.

Please direct any future inquiries about these matters to our outside counsel:

Robert S. Sanoff
Foley Hoag, LLP
155 Seaport Blvd, Boston, MA 02210
Tel (617) 832-1152
Email: rsanoff@foleyhoag.com

Sincerely yours,

Mark Leskowicz

Enclosures
Cc: Robert S. Sanoff, Esquire

EXHIBIT A

(3)

UNION CARBIDE

UNION CARBIDE CORPORATION P.O. BOX 160, SISTERSVILLE, WEST VIRGINIA 26175
Specialty Chemicals Division
SILICONES PLANT

June 8, 1987

MEMORANDUM TO: SWMU File

SUBJECT: May 15, 1986 Conversation with EPA Dealing with the North 40 Inactive Disposal Site and Possible PCBs.

During EPA's review of the Sistersville's inactive disposal sites (SWMU inspection on 5/15/86) they noticed the words "magic chemical" listed as a material that would be analyzed for from wells placed around the north site. They asked what that might be and I stated that during the plant's activity to look for PCBs during late 1978-1979, as a result of the PCB law, it was speculated that as much as 500,000 lbs. of contaminated PCB heat fluid was generated during the plant's previous activities and its disposition was never determined. Thus, it could have been placed in an inactive site.

As a result of that possibility groundwater and the inactive sites were examined for PCBs along with other materials. All the results of the tests and analyses conducted showed no PCBs and that data was included in the information provided.

Nothing more was asked about PCBs by the inspectors.

Fred E. Dailey

Fred E. Dailey

FED:slc
1293A

MPM0001858

EPA000001

UNION CARBIDE CORPORATION

SISTERSVILLE, WV

MEMO TO: D. G. Moshier

January 10, 1980

Copies To: A. W. Boyd
R. T. Kramer
D. N. Verner

Subject: Buried Waste Site II (North of Plant Proper)

The purpose of this memorandum is to attempt to summarize all of the information I have collected to date regarding the identity and quantity of silicone and chlorosilane wastes buried in this area of the Sistersville property.

To properly understand the present situation a certain amount of plant history is pertinent.

The plant was originally built with coal fired boilers which were converted to oil in 1974-1975. A single sewer system collected cooling water and acid process waste streams and delivered these to lime ponds in the present EP area. Sewage treatment consisted of passing waste water through these ponds, over hauled-in limestone. Chlorosilane wastes were discharged to these ponds or dumped in holes in the cinder piles. As ponds filled with sludge they were drained and dug out, with the waste piled on the flats in the area. Drums full of intractable materials accumulated on the flats, finally to be buried in trenches about 8 - 10 feet deep.

For about ten years burnable materials were often dumped over a bank and burned in the open. An open pit incinerator followed for five years, and pumpable solvents were burned through a huge burner blasting across Sugar Camp Run, with smoke and fumes escaping to the atmosphere.

In the early 1970's the Sewer Separation Project, the No. 1 Landfill, the UNOX installation and the Kiln Project put an end to these activities - although about 3000 drums of waste materials accumulated in the area where the Coupling Agent facility now stands. These drums were shipped to Chem-Dyne for disposal in 1975-1976.

To complicate the situation, all wastes have not been allowed to rest in peace. When the No. 1 Landfill was constructed, clay for the impermeable lining was obtained from the hillside east of the buried waste area, and subsequently this area was backfilled with sludge from the lime ponds and other wastes in the area where the UNOX units now exist.

No UNOX sludge wastes are buried in this area. These went to No. 1 Landfill after going through No. 1, 2 or 3 sludge basins.

With allowances for material burned in the OPI, on the bank or in the open flame burners, it is reasonable to conclude that in the area of the Sistersville Plant site there are buried about 7000 drums of material which originally contained up to 3,500,000 pounds of silicones or chlorosilanes. Probably 1,000,000 of this was crosslinked gum and another 500,000 pounds was gelled methyl silicone, both of which are essentially solid, non-reactive, non-migrating materials. Another 1,000,000 would have been originally chlorosilanes, still pot heavies, undesirable by-products, etc. which could be expected to hydrolyze to HCl and insoluble silicones; 750,000 pounds would have been cyanoethyltriethoxy silane heavies, and A-1100 heavies with up to 250,000 pounds of PCB's used as chosen during A-1100 distillation. The other 250,000 pounds comprised some toluene solutions, filter cakes of surfactant production campaigns, and a myriad of miscellaneous wastes from the Pilot Plant.

To the best of my knowledge, aside from the PCB's, some toluene, acrylonitrile, and some methacrylate polymers, very few toxics are present in the buried waste area. I also feel that chlorosilanes, as such, have long since hydrolyzed to essentially inert and insoluble silicone species and the HCl has either percolated to Sugar Camp Run or been neutralized by the copious quantities of lime in the area or by the soil itself.

Our test monitoring wells installed in the vicinity in December 1979 should enlighten us on these points.

CF Schubert

CFSchubert/k

UNION CARBIDE CORPORATION
Chemicals and Plastics — Sistersville, WV

October 15, 1979

MEMORANDUM TO: D. G. Moshier

COPY TO: A. W. Boyd

SUBJECT: Buried Wastes - Sistersville

I discussed this subject at length this morning with Ron Van Mynen. Points covered included how much, where, what effects we've noted, and what we are doing. I made sure that Ron understood that we may have 500,000 pounds of PCB in the north landfill area and that 1 to 2 ppb may be found in Sugar Camp Run. He was not alarmed about this and doubts if we need to worry about it.

He agrees that we need to get Cheely's proposal before doing much beyond the type sampling we have already done. I should like to review Cheely's proposals with Ron before we implement them. Ron expects to visit Sistersville with Bob Kramer about November 28, 1979. He indicated that problems at other plants were much more serious than ours appeared to be.

C. F. Schubert

CFS/jec

UNION CARBIDE CORPORATION
Chemicals and Plastics — Sistersville, WV

Circa Aug 1979

INTERVIEW WITH: G. M. Fowles

SUBJECT: Waste Disposal (Buried and Otherwise)

Jim Ramsey was in charge of Stores and J. Catasein was responsible for waste collection which consisted in storing drums in its present EP area. GMF inherited this area about 1958 with hundreds of unmarked drums. A good many drums were perforated with incendiary shells, others punctured and ignited. Gels, oils, chlorosilanes, solvents, etc.

Sludge pot samples, after setting overnight, became sensitive to handling - often blowing up when moved. These were dumped over the bank and usually exploded. Various devices were invented to do this with minimal exposure to personnel.

Still pot residues, like those from the A-1100 distillation, went into lime ponds and the neutralization tub or were dumped over the "burning bank".

Dirty solvents were sold for oil well treatment until there was a complaint from a gas user; then they were disposed of internally by burning.

It was stressed that there was nearly always a fire going on in the north dump area. Two summer employees at that time were John McGinnis and Alden Wince, local area teachers. Heavy smoke clouds were deemed a mark of productivity and at times evoked complaints from people across the Ohio River, as well as from nearby folk.

Fire was judged to be the "ultimate solution" in those days, and most waste burials were ignited before being covered up.

C. F. Schubert

C. F. Schubert

CFS/jec

UC 149-2

UNION CARBIDE

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS • SILICONES PLANT P.O. BOX 180, SISTERSVILLE, WEST VIRGINIA 26175

To (Name)
Division
Location

Date August 16, 1979

Originating Dept.

Answering letter date

Copy to

Subject Buried Wastes

This morning I discussed this subject with G. M. Fowles, a UCC retiree presently living in Florida, formerly Department Head of Utility Systems and Waste Disposal at the Sistersville Plant.

GMF stated he had had nothing to do with the material buried south of the plant. A. G. Olds and J. A. Catasein were the knowledgeable personnel on that subject.

GMF also stated that no tight drums were buried north of the plant. All were perforated. He recalled that chlorosilanes were disposed of in lime beds or ponds and that the north well water went bad from this practice.

He observed that when the waste water treatment facilities were built a considerable amount of the buried wastes were moved about, especially toward the east against the hill side where rock and clay had been removed. No untoward incidents, i.e., fires, explosions, vapor clouds, or illnesses among workers were noted at this time.

George expects to be in the Sistersville area later this month and I plan to pick his memories a little more at that time.

C. F. Schubert

C. F. Schubert

CFS/jec

Koehler 1242

(2)

Don M.

I don't know what all has been done but I would like to have some additional work with a presentation late next week

1- Sample results
2- Overview of plant site showing sample points, places where burial exist
3. How much stuff buried
What kind of " "
Specifically PCB

May have to talk to several people to find out

4. Program to identify condition of burial sites

5. What should be done about drinking water flow from wells

MPM0001853

EPA000007

The Pilot Plant used Aroclor 1232 until May 6 1972
Changed to Therminol 55 and then to
Therminol 60 on Jan 26 1974

R M Boehler

Aroclor 1242 until 7-66

Monsanto used Aroclor 1248 (1-76) until ~~[illegible]~~ 12-11-70 and then
changed to UCON Fluid (HB-260) (a[illegible] 4-48-57)

7-27-79

J A Townsend

cat

Totals	Therminol 55	40862	3,740	Deleted 2-17-74
	60	40862	17,240	
7-30-79	Aroclor 1232	14340	84,800	Deleted 2-11-72
	1242	14345	85,600	Deleted 7-66
	1248	14345	530,000	Deleted 12-11-[illegible]

7-30 Polymer Well is operable
Monsanto Well has no pump.

MPM0001854

EPA000008

Use of Aroclors

Past Purchases

Aroclor 1242	85,600	Deleted 7-66
Aroclor 1232	54,800	Deleted 2-72
Aroclor 1248	530,000	Deleted 12-70

Aroclor 1232 Used in Small Scale Heat Transfer Systems

Aroclors 1242 and 1248 Used in Coupling Agent Production

MPM0001855

EPA000009

6. What to tell employees, state, EPA, etc

7. Features sample program

8. More test wells

9. Etc

There is not time to do a lot of detailed work before next week but the direction of the study should be reasonably clear. We need to get good advice from SSAIC on what actions we should be taking so that they feel involved and we have best ideas available.

AWB

DGM

3-6-79

Perry wants us to better understand our buried waste dumps. We have several(?) locations around the plant. Please give thought to

- identification of spots with markers
- a permanent file in our office which details the inventory
- a probe of the downstream water table to see if we are leaching anything toward the river or other streams
- discussions with VanMaanen the wisdom of doing any work which will increase our awareness and accountability

Walker

MPM0001857

EPA000011

UNION CARBIDE CORPORATION
Law Department

39 Old Ridgebury Road
Danbury, CT 06817

July 30, 1987

Fred Dailey
Sistersville Plant

Re: Section 103(c) CERCLA Notification

Dear Fred:

You asked me whether Sistersville's 1981 Notification of Hazardous Waste Site form (EPA Form 8900-1) submitted to U. S. EPA pursuant to Section 103(c) of CERCLA should be revised to state that there may be PCB waste at the inactive disposal sites at the Sistersville plant which were reported on the form. The form indicates that these inactive sites contain silicone wastes and residues. No mention is made of PCBs.

I have reviewed the information you sent me by memorandum dated June 8, 1987 regarding PCBs. It indicates that PCBs were used at the plant and that there is speculation that significant amounts of PCBs may have been buried in the north inactive site. Indeed, this "speculation" was orally conveyed by you to the U. S. EPA inspectors during a RCRA solid waste management unit (SWMU) inspection on May 15, 1986. The information provided also indicates that, to date, PCBs have not been detected as the result of groundwater monitoring conducted at the north inactive site.

In my opinion, there is no legal basis for revising your 1981 Notification of Hazardous Waste Site form because:

1. The inactive landfills and the materials plant personnel had reason to "know, believe or recollect" were buried in them was reported in 1981. This information, according to your May 15, 1981 memorandum to Hampton Parker, was based on the knowledge and recollections of a person who had worked in the EP department at Sistersville for 25 years and was familiar with plant disposal practices as well as the actual investigation being conducted by another employee that had been initiated in the 1-2 years prior to 1981.

2. Based on my review of the documents you provided me, information on PCBs is speculative at best. None of the documents indicate that any plant personnel had actual knowledge of PCB disposal at the north landfill site. Indeed, PCBs have not been detected as the result of actual monitoring conducted to date.

3. Because of the 1984 amendments to RCRA, the two inactive sites at Sistersville are SWMUs. Any corrective action will be mandated as part of your RCRA permit. You orally advised the EPA inspectors in 1986 of the PCB speculation and provided sample results showing that no PCBs were detected.

4. The Notification of Hazardous Waste Site Form, required by CERCLA to be submitted by June 9, 1986, was published in the April 15, 1981 Federal Register. In the notice accompanying this form, at page 22145, the Agency stated:

> "The Agency recognizes that the statutory deadline may not permit many persons, particularly those who are responding for a number of facilities, to undertake extensive searches of archives or to interview former employees to determine the type of activities that took place at a facility years ago, or to sample and analyze the wastes located in facilities. The response may therefore be based on the respondent's [present] knowledge, belief, recollection and an examination of reasonably available records."

Again, the Sistersville plant, in response to speculation of PCB disposal, did actual testing and no PCBs have been found. Actual testing is more than 103(c) of CERCLA, as interpreted by EPA, requires.

In sum, and confirming our earlier phone conversation on this subject, unless future test results indicate the presence of PCBs, it is my opinion that you have no legal obligation to revise your 1981 notification under 103(c) of CERCLA or your SWMU submittal under RCRA.

Very truly yours,

Carol

Carol L. Dudnick

CLD:mm
cc: C. C. Smith, Jr.

3. Because of the 1984 amendments to RCRA, the two inactive sites at Sistersville are SWMUs. Any corrective action will be mandated as part of your RCRA permit. You orally advised the EPA inspectors in 1986 of the PCB speculation and provided sample results showing that no PCBs were detected.

4. The Notification of Hazardous Waste Site Form, required by CERCLA to be submitted by June 9, 1981, was published in the April 15, 1981 Federal Register. In the notice accompanying this form, at page 22145, the Agency stated:

> "The Agency recognizes that the statutory deadline may not permit many persons, particularly those who are responding for a number of facilities, to undertake extensive searches of archives or to interview former employees to determine the type of activities that took place at a facility years ago, or to sample and analyze the wastes located in facilities. The response may therefore be based on the respondent's [present] knowledge, belief, recollection and an examination of reasonably available records."

Again, the Sistersville plant, in response to speculation of PCB disposal, did actual testing and no PCBs have been found. Actual testing is more than 103(c) of CERCLA, as interpreted by EPA, requires.

In sum, and confirming our earlier phone conversation on this subject, unless future test results indicate the presence of PCBs, it is my opinion that you have no legal obligation to revise your 1981 notification under 103(c) of CERCLA or your SWMU submittal under RCRA.

Very truly yours,

Carol

Carol L. Dudnick

CLD:mm
cc: C. C. Smith, Jr.

Blind note to CCS:

Bud - Fred requested that I send you a copy of my memorandum.

UNION CARBIDE CORPORATION
SILICONES AND URETHANE INTERMEDIATES
P. O. BOX 180, SISTERSVILLE, WEST VIRGINIA 26175

(1)

May 15, 1981

MEMORANDUM TO: H. M. Parker
Environmental Affairs
NYO - 22nd Floor

COPIES TO: T. M. Bossick*
D. J. Dowling*
R. T. Kramer
J. E. McDermott*
C. F. Schubert

*Letter Only

Dear Mr. Parker:

Enclosed are the completed "Notification of Hazardous Waste Sites" forms for our Sistersville Plant as in accordance with CERCLA (Super Fund).

The information provided was collected from Clem Schubert and Bob Longwell. Clem has had a project for the past one to two years to examine these inactive waste disposal sites and drill and monitor sample wells at these sites. Bob has worked in the EP area for 25 years and provided knowledge of the disposal practices and residues buried in the past.

Both of these sites were inspected by the EPA Wheeling Office on May 7, 1980.

If you have any questions, please call 304-652-3211 Ext. 381.

Sincerely,

Fred E. Dailey

FED:slc
attachments

MPM0001867

EPA000015

EPA Notification of Hazardous Waste Site

United States Environmental Protection Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name: Union Carbide Corporation-SUI Division
Street: P. O. Box 180
City: Sistersville State: WV Zip Code: 26175

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site: Union Carbide Corporation-SUI Division
Street: P. O. Box 180, Rt. #2
City: Sistersville County: Tyler State: WV Zip Code: 26175

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Dailey, Fred Environmental Engineer
Phone: 304-652-3211 Ext. 381

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1955 To (Year): 1955 South inactive site
1961 To (Year) 1972 North inactive site

E Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste: Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

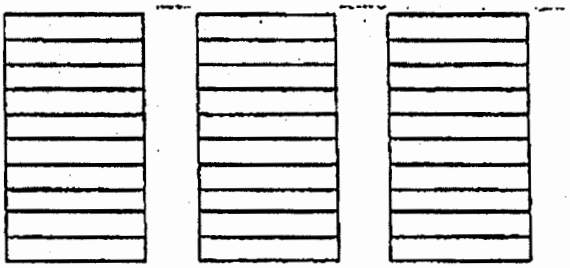
1. ☒ Organics
2. ☒ Inorganics
3. ☒ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☒ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☒ Other (Specify)
Silicone Residues

Source of Waste: Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☒ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☒ Other (Specify)
Silicone by-products and residues

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste: EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.



Form Approved
OMB No. 2060-0138
EPA Form 8900-1

MPM0001868

Notification of Hazardous Waste Site **Side Two**

F. Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☒ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☒ Drums, Below Ground
9. ☐ Other (Specify) _____

Total Facility Waste Amount

cubic feet 461750

gallons _____

Total Facility Area

square feet 111250

acres _____

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☒ None

* To the best of our knowledge

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

See attached Ben's Run Quadrangle Topo map provided with ~~Form 1 of RCRA and NPDES permit applications~~ previously provided.

Also attached is a plant layout sketch. This sketch shows the approximate size and location of the inactive waste disposal sites and monitoring wells associated with these sites.

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

There are two inactive waste disposal sites at the Union Carbide Silicones location. One at the north and one at the south end of the plant. The attached maps (see H) provide a significant description of nearby geological structures and man-made facilities. Approximately 20,000 drums were disposed of in the north site. Location from 1961 to the early 1970's (approximately 455,000 Ft^3 of silicone wastes and residues). At the south inactive site approximately 6750 Ft^3 of silicones wastes and residues were disposed of in 1955.

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name _____

Street _____

City _____ State _____ Zip Code _____

Signature _____ Date _____

☑ Owner, Present
☑ Owner, Past
☐ Transporter
☑ Operator, Present
☑ Operator, Past
☐ Other

MPM0001869

EPA000017

ATTACHMENT #2

EPA ID# WVD004325353

Form 1 - General Item XI Map

Explanation Key of Plant Facilities
Bens Run Quadrangle Topo Map

Note: Dot beside key number indicates location of described item.
Did not include on the Topo RCRA HW equipment in production facilities, due to space limitation; but did show this equipment in Form 3 Item V facility drawing. (Union Carbide Sistersville RCRA application form Nov. 19, 1981.)

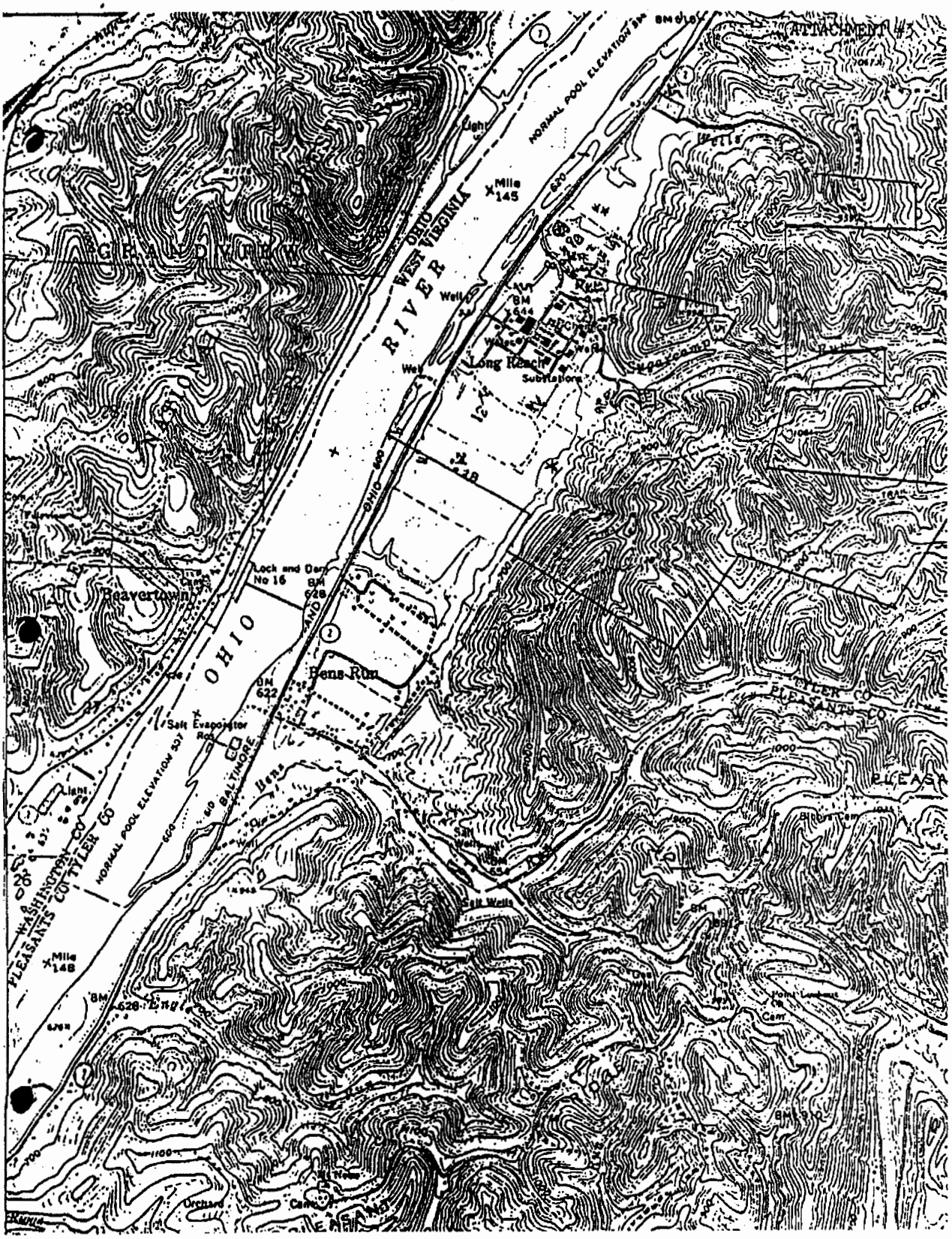
Number Key	Description	Site Number	Remarks
1.	Intake Well No. 1	PS 10A1	
2.	Intake Well No. 2	PS 14A1	Source of Plant drinking water
3.	Intake Well No. 3	PS 16A1	
4.	Intake Well No. 4	PS 17A1	
5.	Cooling Water Discharge 002	PST 25A1	Floats Skimmer - West Unox Reactor
6.	Wastewater Discharge 001	PST 31A1	East Unox Reactor
7.	Rail Yard Holding Pond 003	RR 56	No Installed Structure
8.	Storm Water Runoff Discharge Point		
9.	Storm Water Runoff Discharge Point		
10.	Storm Water Runoff Discharge Point		
11.	Legal Property Line		
12.	No. 1 and No. 2 Sludge Settling Basins		
13.	Kiln Incinerator		
14.	No. 1 Sludge Impoundment/Landfill		
15.	No. 2 Sludge Impoundment		
16.	Drum Flusher		
17.	Filled Drum Storage		
18.	Copper Sludge Removal		
19.	Sludge Pipeline		
20.	Waste Solvent Storage Tks.		
21.	Clarifiers & Unox Reactors		
22.	No. 3 Sludge Settling Basin		
23.	Filter Cake Vat		
24.	Sanitary Use Well		
25.	Residence Drinking Water Well		
26.	Clean Water Ponds		
27.	Storm Water Runoff Discharge Point (004) (By-product, waste storage area)		
28.	Septic System		
29.	Septic System (006)		
30.	Septic System (005)		
31.	Storm Water Runoff Discharge Point		

* South inactive waste disposal site

** North inactive waste disposal site

MPM0001870

EPA000018



MPM0001871

EPA000019

MPM0001872

EPA000020

"Attorney Work Product"
"Prepared at the request of counsel to assess potential liability."

(14)

UNION CARBIDE

UNION CARBIDE CORPORATION P.O. BOX 160, SISTERSVILLE, WEST VIRGINIA 26175
Silicones and Urethane Intermediates
SILICONES PLANT

September 14, 1984

MEMORANDUM TO: R. L. Foster

COPIES TO: A. W. Boyd
F. E. Dailey
W. V. Summers

SUBJECT: Mitre Score for Inactive Landfills

Enclosed you will find the mitre scores calculated for our two inactive landfill sites. These are the two inactive sites listed on the 1981 CERCLA 103(c) notification.

The north site appears to be the most potentially hazardous. Although no definite evidence can be found, it is possible that up to 250,000 pounds of PCB's are buried at this site. Also, some acrylonitrile, methacrylate polymers, and toluene are buried at the north site. The area contains both full and empty drums, and some of the full drums may contain chlorosilanes which could hydrolyze and form HCl. The soil in this area is primarily fine sand and silty clay down to the groundwater, making potential contamination of the groundwater a concern. However, wells at this site when last monitored in 1981 showed no significant leaching or contamination and no PCB's were found. Approximately 7,000 drums were buried at this site.

The south site appears to be of low concern. All drums at this site were punctured prior to burial, allowing the chlorosilanes, oils, resins, and copper-silicon mass to drain. Presumably, the chlorosilanes hydrolyzed at the time of burial. The south site is made up primarily of silty clay (relatively low permeability). Thus, contamination of the groundwater is not as significant a concern as at the north site. Approximately 400 drums are buried at the south site.

Surface water from both sites can reach the plant's Ramney wells, although monitoring indicates that this is not occuring. This significantly increased the surface water score of both sites due to the plant population being served from a point so close to where possible contaminants might be released.

Our estimates for remedial actions are based upon the knowledge we have of the area. No studies have been done which might indicate the feasibility of one remedial action above another.

MPM0001873

EPA000021

If you have any questions about this report, please contact us at extension 377 and 286, respectively.

Sincerely yours,

Dennis R. Heintzman

Dennis R. Heintzman

E. L. Doerflein

DRH:ELD:slc
V.08A.11

"Attorney Work Product"
"Prepared at the request of counsel to assess potential liability."

ANALYSIS OF DCC SITES
REPORTED UNDER 103c NOTIFICATION REQUIREMENTS OF CERCLA

"Prepared at the request of counsel to assess potential liability."

Reporting Location Sistersville State West Virginia Component SUI

Item No.	Site Identification	Calculated MITRE Score (1)	Size of Disposal Area: Hectacres (10,000 m^2)	Size of Disposal Area: Perimeter in Meters	Designation of Estimated Remedial Actions (2)	Cost Estimate (1980 dollars) (2): Capital $	Cost Estimate (1980 dollars) (2): O/M $/year
1	North Inactive Site	21,7	.8826	320.4	Northsite: 1) Worst case (15) Excavation/ Disposal	11,531,374	9,270
					2) Less costly option (9) Well Point System with (19)Treatment of Cont. Groundwater	41,257 162,446	11,070 83,700
2	South Inactive Site	5.8	.1509	114.3	Southsite: 1) Worst case (15) Excavation/ Disposal	1,971,956	9,270
					2) Less costly option (4) Slurry Trench Cutoff Wall with (19) Treatment of Cont. Groundwater (Well point system will not work well in impermeable soil of south site.)	160,675 27,780	9,270 83,700

1) HRS Appendix A FR 7/16/82
2) Use draft of Dept. of Commerce designations (e.g., Table 10, No. 1, 5, 19) OR supply criteria used.

19878

ATTACHMENT I

Plant Stersville
Division SOI

Summary of On-Site Facili[illegible] a which store, treat, dispose of products or wastes

"Attorney Work Product"
"Prepared at the request of counsel to assess potential liability."

FACILITY NAME	FACILITY Type	FACILITY Size in Area*	FACILITY Linear Dimensions (ft.)	NO. OF LINERS 0	NO. OF LINERS 1	NO. OF LINERS 2	LINERS WITH LEACHATE COLLECTION 0	LINERS WITH LEACHATE COLLECTION 1	LINERS WITH LEACHATE COLLECTION 2	YEAR Opened or Built	YEAR Closed
Union Carbide Corporation Sistersville Plant-North Site	36	2.18	100' x 100' 200' x 300' 100' x 250'	X			X			1961	1972
Union Carbide Corporation Sistersville Plant-South Site	36	.37	50' x 320'	X			X			1955	1955

Submitted by: D.L. Huntzinger, E.K. Douglass

*Area in acres, to nearest one-hundreth

ATTACHMENT II

MPM0001876

EPA000024

HAZARD RANKING SYSTEM

COVER SHEET

Facility name: North Inactive Site - Union Carbide Corporation Silicones and Urethane Intermediates

Location: Sistersville, WV

EPA Region: 3

Person(s) in charge of the facility: A. W. Boyd, Plant Manager

Name of Reviewer: D. R. Heintzman, E. L. Doerflein Date: 9/12/84

General description of the facility:

(For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)

The north inactive site consists of a closed waste pit covering 2.2 acres. The area contains both empty and full drums. Approximately one-third of the waste buried in the site is crosslinked gum and gelled methyl silicone, both of which are nonhazardous. The contaminants of greatest concern are PCB's which may have been buried in the area. Other hazardous wastes believed to be buried at the site are chlorosilanes, silicone residues, and organic compounds such as toluene and acrylonitrile. Earth in the area is moderately permeable, with fine sand and silty clay prevalent, thus the contamination route of major concern is the groundwater (S_{gw} = 27.8). Direct contact is also a significant concern (S_{dc} = 25).

Scores: S_M = 21.7 (S_{gw} = 27.8 S_{sw} = 15.2 S_a = 0)

S_{FE} = 0

S_{DC} = 25

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability".

HAZARD RANKING SYSTEM

GROUND WATER ROUTE WORK SHEET

Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Observed Release	(0) 45	1	0	45	3.1
If observed release is given a score of 45, proceed to line 4. If observed release is given a score of 0, proceed to line 2.					
2 Route Characteristics					3.2
Depth to Aquifer of Concern	0 1 2 (3)	2	6	6	
Net Precipitation	0 1 (2) 3	1	2	3	
Permeability of the Unsaturated Zone	0 1 (2) 3	1	2	3	
Physical State	0 1 2 (3)	1	3	3	
Total Route Characteristics Score			13	15	
3 Containment	0 1 2 (3)	1	3	3	3.3
4 Waste Characteristics					3.4
Toxicity/Persistence	0 3 6 9 12 15 (18)	1	18	18	
Hazardous Waste Quantity	0 1 2 3 4 5 (6) 7 8	1	6	8	
Total Waste Characteristics Score			24	26	
5 Targets					3.5
Ground Water Use	0 1 2 (3)	3	9	9	
Distance to Nearest Well/Population Served	0 4 6 (8) 10 / 12 16 18 20 / 24 30 32 36 40	1	8	40	
Total Targets Score			17	49	
6 If line 1 is 45, multiply 1 x 4 x 5 / If line 1 is 0, multiply 2 x 3 x 4 x 5			15912	57,330	
7 Divide line 6 by 57,330 and multiply by 100	S_{gw} = 27.8				

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability"

HAZARD RANKING SYSTEM

GROUND WATER ROUTE WORK SHEET

NOTES

(2) -Groundwater reached at depths of as little as 14 feet
-Net precipitation - 8"
-Permeability of area is moderate due to fine sand and silty clay in the area of the landfill
-Physical state - liquids present, some of which may hydrolyze to HCl gas if contacted with water

(3) -Containment - full and leaking drums, no liner is present

(4) -Toxicity - PCB's are possibly present at the north site, along with some toluene and other hazardous waste
-Quantity - 2.25 million pounds (approx. 4700 drums)

(5) -Targets - approx. 20 dwellings within 1 mile of plant assumed to use well water from the same aquifer

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

SURFACE WATER ROUTE WORK SHEET

Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Observed Release	0 45	1	0	45	4.1
If observed release is given a value of 45, proceed to line 4. If observed release is given a value of 0, proceed to line 2.					
2 Route Characteristics					4.2
Facility Slope and Intervening Terrain	0 1 (2) 3	1	2	3	
1-yr. 24-hr. Rainfall	0 1 (2) 3	1	2	3	
Distance to Nearest Surface Water	0 1 2 (3)	2	6	6	
Physical State	0 1 2 (3)	1	3	3	
Total Route Characteristics Score			13	15	
3 Containment	0 1 (2) 3	1	2	3	4.3
4 Waste Characteristics					4.4
Toxicity/Persistence	0 3 6 9 12 15 (18)	1	18	18	
Hazardous Waste Quantity	0 1 2 3 4 5 (6) 7 8	1	6	8	
Total Waste Characteristics Score			24	26	
5 Targets					4.5
Surface Water Use	0 1 (2) 3	3	6	9	
Distance to a Sensitive Environment	(0) 1 2 3	2	0	6	
Population Served/Distance to Water Intake Downstream	0 4 6 8 10 / 12 16 18 (20) / 24 30 32 36 40	1	20	40	
Total Targets Score			26	55	
6 If line 1 is 45, multiply 1 x 4 x 5. If line 1 is 0, multiply 2 x 3 x 4 x 5			16224	64,350	
7 Divide line 6 by 64,350 and multiply by 100		S_{sw} =	25.2		

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

SURFACE WATER ROUTE WORK SHEET

NOTES

② -Distance to nearest surface water - Sugar Camp Run flows directly past landfill and then into Ohio River
-1 year 24 hour rainfall approx. 2.25"

⑤ -Surface water use - fishing and boating
-Sensitive Environment - Ohio River not a sensitive environment
-Population served - plant intake is within 2,000 ft. of discharge of surface water which could potentially be contaminated

"Attorney Work Product"
"Prepared at the request of counsel to assess potential liability."

MPM0001881

EPA000029

HAZARD RANKING SYSTEM

AIR ROUTE WORK SHEET

Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Observed Release	0 46	1	0	46	5.1
Date and Location:					
Sampling Protocol:					
If line 1 is 0, the S_a = 0. Enter on line 5. If line 1 is 46, then proceed to line 2.					
2 Waste Characteristics					5.2
Reactivity and Incompatibility	0 1 2 3	1		3	
Toxicity	0 1 2 3	3		9	
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8	
	Total Waste Characteristics Score			20	
3 Targets					5.3
Population Within 4-Mile Radius	0 9 12 15 18 / 21 24 27 30	1		30	
Distance to Sensitive Environment	0 1 2 3	2		6	
Land Use	0 1 2 3	1		3	
	Total Targets Score			39	
4 Multiply 1 x 2 x 3				35,100	
5 Divide line 4 by 35,100 and multiply by 100	S_a = 0				

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

AIR ROUTE WORK SHEET

NOTES

No observed release

"Attorney Work Product"
"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

WORKSHEET FOR COMPUTING S_M

	S	S^2
Groundwater Route Score (S_{gw})	27.8	773
Surface Water Route Score (S_{sw})	25.2	635
Air Route Score (S_a)	0	0
$S_{gw}^2 + S_{sw}^2 + S_a^2$		1408
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2}$		37.5
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2} / 1.73 = S_M =$		21.7

NOTES

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

FIRE AND EXPLOSION WORK SHEET

Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Containment	1 3	1		3	7.1
2 Waste Characteristics					7.2
Direct Evidence	0 3	1		3	
Ignitability	0 1 2 3	1		3	
Reactivity	0 1 2 3	1		3	
Incompatibility	0 1 2 3	1		3	
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8	
Total Waste Characteristics Score				20	
3 Targets					7.3
Distance to Nearest Population	0 1 2 3 4 5	1		5	
Distance to Nearest Building	0 1 2 3	1		3	
Distance to Sensitive Environment	0 1 2 3	1		3	
Land Use	0 1 2 3	1		3	
Population Within 2-Mile Radius	0 1 2 3 4 5	1		5	
Buildings Within 2-Mile Radius	0 1 2 3 4 5	1		5	
Total Targets Score				24	
4 Multiply 1 x 2 x 3				1,440	
5 Divide line 4 by 1,440 and multiply by 100	S_{FE} = 0				

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

FIRE AND EXPLOSION WORK SHEET

NOTES

No demonstrated threat from fire and explosion.

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

DIRECT CONTACT WORK SHEET

Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Observed Incident	0 45	1	0	45	5.1
If line 1 is 45, proceed to line 4 If line 1 is 0, proceed to line 2			2		
2 Accessibility	0 1 2 (3)	1	3	3	5.2
3 Containment	0 (15)	1	15	15	5.3
4 Waste Characteristics Toxicity	0 1 2 (3)	8	5	18	5.4
5 Targets					5.5
Population Within a 1-Mile Radius	0 1 (2) 3 4 5	4	8	20	
Distance to a Critical Habitat	(0) 1 2 3	4	0	12	
Total Targets Score			8	32	
6 If line 1 is 45, multiply 1 x 4 x 5 If line 1 is 0, multiply 2 x 3 x 4 x 5			5400	21,600	
7 Divide line 6 by 21,600 and multiply by 100		SDC =	25		

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

DIRECT CONTACT WORK SHEET

NOTES

(2) -Accessibility - Landfill is open to the plant proper. Outer boundary is protected by the plant fence.

(3) -Containment - Buried wastes are within 2 ft of the top of the ground.

(5) -Population - Plant workforce plus residents of a few single family dwellings.

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

HAZARD RANKING SYSTEM

DIRECT CONTACT WORK SHEET

NOTES

② -Landfill has no barriers

③ -Buried wastes are within 2 ft of the surface of the ground

④ -Possibility of HCl being present or being generated by hydrolysis reactions

⑤ -Population is <100 within a 1 mile radius.

"Attorney Work Product"

"Prepared at the request of counsel to assess potential liability."

KEMRON

Kemron Environmental Services
235 Second Street
Marietta Ohio 45750
Telephone (614) 374-2222

Sample Source	See Below	Report Date	1/10/80
Collected By	Union Carbide Corp.	Date Collected	11/19/79
For	Union Carbide Corp.	Date Received	11/21/79
	P. O. Box 180	Date(s) Analyzed	12119/NK
	Sistersville, WV 26175	Data Number	112179-3
	Attn: C. F. Schubert	P. O. Number	

ANALYTICAL RESULTS

SAMPLE		TOTAL POLYCHLORINATED BIPHENYLS (µg/L)	
EPC #32-1A	From Test Well at Refinery wall	< 0.5	
EPC #33-1	Pond B- Site I	*	
EPC #33-2	Bottle Drinking Water	< 0.5	
EPC #33-3	Plant Potable Water System	< 0.5	
EPC #33-4	Plant Process Water	< 0.5	
EPC #33-5	UNOX Effluent 11-20-79	< 0.5	
EPC #33-6	Sugar Camp Run 11-20-79	1.5	Upstream of UNOX
EPC #33-7	Sugar Camp Run at Route 2 11-20-79	2.0	

* Result not available — sample broken in transit.

Analysis Number 78-110-01

Official Methods Used in This Analysis

Eugene M. Schaeffer
Laboratory Supervisor

SISVIL013203

EPA000038

Kemron Environmental Services
235 Second Street
Marietta, Ohio 45750
Telephone (614) 374-2222

Sample Source	See Below	Report Date	3/18/80
Collected By	Union Carbide	Date Collected	-
For	Union Carbide	Date Received	2/18/80
	P. O. Box 180	Date(s) Analyzed	3/14/NK
	Sistersville, WV 26175	Data Number	021880-1
	Attn: C. F. Schubert	P. O. Number	

ANALYTICAL RESULTS

SAMPLE		TOTAL POLYCHLORINATED BIPHENYLS (µg/L)
57-1	Well #2A - Lt II 1-21-80	6
57-2	Well # 4 Lt II 1-21-80	< 5
57-3	Sugar Camp Run (above Road to landfill) 1-21-80	< 5
57-4	# 1 Test Well at Ramp #1	< 5
57-5	#4 Lt I 1-15-80	< 5

Analysis Number 78-110-01

Official Methods Used in This Analysis

Eugene M. Schaeffer
Laboratory Supervisor

UNION CARBIDE CHEMICALS AND PLASTICS COMPANY INC. SPECIALTY CHEMICALS
Environmental Protection Sistersville WV

March 11, 1992

MEMORANDUM TO: D. Liebeskind

COPIES TO: F. E. Dailey
C. C. Neinhuis
L. W. Phair
E. D. Southard

SUBJECT: North Inactive Site

Attached are the memoranda in the inactive site disposal files relative to the potential of PCB's being disposed of in the north inactive site.

Included are:

1/10/80 and 3/18/80 - Kemron PCB Analytical Data: As I understand it this data, which was later determined not to be valid, is what triggered the search for PCB's which might have been disposed of. I can find nothing in the files saying this data is not valid, but all analyses conducted since then have not shown PCB's.

1/10/80 - C. F. Schubert Letter on Buried Waste Site II: Letter says that up to 250,000 pounds of PCB's used during A-1100 distillation may have been disposed of at the north inactive site.

5/3/81 - F. E. Dailey Memo Concerning Phenyltrichlorosilane Production: Memorandum states that we do not believe our technology for phenyltrichlorosilane production produced PCB's.

6/8/87 - F. E. Dailey to SWMU File: Basis for speculation that PCB fluids might have been disposed of in the north inactive site.

7/30/87 - C. L. Dudnick re: Section 103(c) CERCLA Notification: Memorandum stating that there is no basis for revising the 1981 Notification of Hazardous Waste Site form.

SISVIL013200

EPA000040

Based on the limited information available, it is not possible to state unequivocally that PCB's were not placed in the north inactive site. Information suggesting disposal is purely speculative at this point, however. Monitoring data to date do not substantiate the speculation.

Sincerely,

Dennis R. Heintzman

Dennis R. Heintzman

DRH:slm
PCB

SISVIL013201

EPA000041